REMARKS

This Response addresses the issues raised by the Examiner in the Office Action mailed May 8, 2006. Initially, Applicants would like to thank the Examiner for the careful consideration given this case. In view of the following remarks, Applicants feel that all outstanding issues have been addressed and prompt allowance of all remaining claims is respectfully requested.

§102 Rejection

Although the Examiner previously indicated allowability of all of the claims of the present invention, the Examiner thereafter rejected Claims 9-12 and 18-20 under 35 U.S.C. 102(e) as being anticipated by "new" reference U.S. Patent Application Number 2001/0042118 Miyake et al ("Miyake"). In response, Applicants amended each independent claim in order to further distinguish the present invention from Miyake. Now, the Examiner has attempted to read these amended limitations into the teaching of Miyake. However, the Examiner appears to have exceeded the teachings of Miyake in his arguments, and Applicants respectfully request that the Examiner re-institute the proper allowability of these claims as set forth more fully below.

The present invention, as claimed, includes a system and methods for visualizing a multi-layer schematic topology including the adaptability of displaying a wide variety of components at a plurality of different view levels. As a user selects a component and requests a change in view level, the system of the present invention can accommodate that task because the databases of the present invention maintain connection and relation data between components at different view levels.

Importantly, the present invention also includes partial domain management units (see, e.g., Claim 9) prepared for each of a plurality of partial domains defined in the topology schematic. The connection lines and relationships between various components are maintained not only within each partial domain, but also across all of the different partial domains. Miyake, on the other hand, represents only a single "partial domain" according to the present invention. Miyake, therefore, teaches the use of connection and relationship data within a single partial domain, but the present invention is directed to maintaining and utilizing this connection and relation data between components in different partial domains.

The independent claims were previously amended to more particularly point out this concept and more clearly distinguish the present invention from Miyake and the other cited

prior art. For example, Claim 9 specifically states that "said connection lines are defined between components in different partial domains," and Claim 10 specifically states that "said distinct correspondence between components is defined between components in different partial domains. Although Applicants believe that this distinction was already within the scope of the claims of the present application, Applicants made these amendments in the interests of bringing the present prosecution to a successful conclusion.

Office Action Response

. •

The Examiner now attempts to read these claim amendments into the Miyake reference. Specifically, in the Final Office Action, the Examiner argued that the amended claim limitation (e.g., "wherein the connection lines are defined between components in different partial domains") was found within Miyake. The Examiner stated that "figs 79-82 [of Miyake] show connection lines defined between components in different partial domains, responsive to user input." See Office Action at p.3. However, this is simply not true. A review of these Miyake figures shows instead that the connection lines are between components within the same partial domain.

In more detail, spatial area 46, 47 (from Miyake Figs. 79-115) correspond to one partial domain of the present invention. In Miyake, these figures can therefore only express a connection relation among different layers within the same partial domain (only one small aspect of the present invention). However, the present invention clearly teaches (and claims) the connection relation among different layers among different partial domains. There is simply no teaching or suggestion within Miyake, or any other cited reference, of this feature. Therefore, at least the two portions of the claim quoted above distinguish from the teachings of Miyake.

Conclusion

The above remarks address each and every concern raised by the Examiner in the Office Action. Applicants believe that all remaining claims of the present invention are now

in condition for final allowance. If the Examiner feels that any issues remain outstanding, the Examiner is encouraged to contact Applicant's attorney at the contact information below.

Respectfully submitted,

Stanley P. Fisher

Registration Number 24,344

Juan Carlos A. Marquez

Registration No. 34,072

Robert D. Kucler

Registration No. 45,908

REED SMITH LLP

3110 Fairview Park Drive Suite 1400 Falls Church, Virginia 22042 (703) 641-4200 August 8, 2006

SPF/JCM/RK